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9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 LAURA GRIFFIN, an individual,

12 Plaintiff,

13 vs.

14 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, a government entity, and
15 DOE LVMPD OFFICERS 1-10, in their
individual capacity,

16 Defendants.

Case No.: 2:24-cv-01209-CDS-EJY

STIPULATION TO STAY DISCOVERY
(1st Request)
[ECF No. 18]

17 Laura Griffin (“Plaintiff”), through her attorneys The American Civil Liberties Union of
18 Nevada and Spencer Fane, and Las Vegas Metropolitan Police Department (“LVMPD”), by and
19 through its counsel, Kaempfer Crowell, hereby stipulate as follows:

20 1) On September 25, 2024, the initial Scheduling Order was entered in this matter. [ECF
21 No. 14]. On October 16, 2024, an Order granting a Stipulation to Extend Discovery Deadlines
22 (1st Request) was entered. [ECF No. 18]. The extension was requested because the parties have
23 been actively engaged in discussions attempting to resolve this matter. [*Id.*].

24 2) Since discovery commenced in this matter, the parties have only exchanged Rule 26

1 disclosures in an effort to minimize attorney's fees and costs in the hopes of resolution.

2 3) The parties have reached a tentative resolution of this matter and are working to
3 finalize it. In light of the likely resolution of this matter, the parties jointly request a stay of all
4 unexpired discovery deadlines in this matter. A district court has discretionary power to stay
5 proceedings in its own court. *Landis v. N. Am. Co.*, 299 U.S. 248, 254-55, 57 S. Ct. 163, 81 L.Ed.
6 153 (1936). A trial court may, with propriety, find it is efficient for its own docket and the
7 fairest course for the parties to enter a stay of an action before, pending resolution of independent
8 proceedings which upon the case. *Leyva v. Certified Grocers of Cal., Ltd.*, 593 F.2d 857, 863 (9th
9 Cir. 1979). "When considering a motion to stay, the district court should consider three factors:
10 (1) potential prejudice to the non-moving party; (2) hardship and inequity to the moving party if
11 the action is not stayed; and (3) the judicial resources that would be saved by avoiding
12 duplicative litigation if the cases are in fact consolidated." *Pate v. Depuy Orthopaedics, Inc.*, No.
13 2:12-cv-01168-MMD-CWH, 2012 U.S. Dist. LEXIS 114333 (quoting, *Rivers v. Walt Disney*
14 *Co.*, 980 F. Supp. 1358, 1360 (C.D. Cal. 1997). As such, the parties make this request to
15 eliminate the need to expend fees and costs at this time and to avoid wasting judicial resources.

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4) In the unlikely event the parties do not finalize a settlement, the parties will promptly submit a new Discovery Plan and Scheduling Order allowing discovery to resume for ninety (90) days.

DATED this 31st day of October, 2024.

DATED this 1st day of November, 2024.

/s/ Athar Haseelbullah

/s/ Lyssa S. Anderson

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ORDER

IT IS SO ORDERED.

Dated this 1st day of November, 2024.


UNITED STATES MAGISTRATE JUDGE